

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**G & G Closed Circuit Events LLC,**

Plaintiff,

vs.

**Ashleigh Bertolini, individually, and GLO  
718 Corp. d/b/a PARQ,**

Defendants.

**Index No. 21-cv-07351**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Local Civil Rule 56.1 Statement, dated December 2, 2022, the Declaration of Emmanuel Colon, December 2, 2022, the Declaration of Rob Rickner, dated December 2, 2022, and the exhibits annexed thereto; the accompanying Memorandum of Law in Support of Defendants' Motion for Summary Judgment, dated December 2, 2022; and upon all prior pleadings and proceedings had herein, defendants Ashleigh Bertolini, individually, and GLO 718 Corp. d/b/a PARQ, will move this Court before Judge Denise L. Cote, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007-1312, on a return date to be set by the Court, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that no genuine issue of material fact exists to warrant a trial, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
December 2, 2022

Respectfully submitted,

/s/ Shana Fried

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/s/ Rob Rickner

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